

Friday, May 3, 2024 at 15:39:31 Eastern Daylight Time

Subject: Guasto v. The City of Miami Beach, et al., Case No.: 1:22-cv-21004-DPG | Notice of Intent to Serve Subpoenas
Date: Thursday, February 29, 2024 at 12:04:42 AM Eastern Standard Time
From: Michael Elkins
To: Daniel Barroukh
CC: Kyle MacDonald, David Rodriguez, benjaminbraun@miamibeachfl.gov, henryhunnefeld@miamibeachfl.gov
Attachments: image007.png, image008.png, image009.png, image010.png, image011.png, image012.png, GPS Security Subpoena.pdf, Miami Dade College Subpoena.pdf, Opa Locka Subpoena.pdf

Daniel,

Pursuant to Federal Rule of Civil Procedure 45(a)(4), please see the attached subpoenas which I will serve on March 1, 2024.

Kind regards,



Michael L. Elkins

Founder | Partner

MLE Law

A modern, 21st century law firm

m. +1 954 401 2608

e. melkins@mlelawfirm.com

w. mlelawfirm.com

1212 NE 16th Terrace

Fort Lauderdale, Florida 33304

United States of America



This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JESSICA GUASTO

Plaintiff

v.

CITY OF MIAMI BEACH

Defendant

Civil Action No. 1:22-CV-21004-DPG

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: College Legal Counsel – Office of Legal Affairs - Miami Dade College
300 NE 2nd Ave., Suite 1453, Miami FL 33132*(Name of person to whom this subpoena is directed)*

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: SEE EXHIBIT A

In lieu of appearance, documents can be emailed to: Michael L. Elkins, Esq.; melkins@mlelawfirm.com

Place: MLE Law
1213 SE 3rd Ave.
Fort Lauderdale, FL 33316Date and Time:

03/18/2024 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/28/2024

CLERK OF COURT

OR

*Michael Elkins**Signature of Clerk or Deputy Clerk**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* _____
City of Miami Beach _____, who issues or requests this subpoena, are:

Michael L. Elkins, Esq.; melkins@mlelawfirm.com; 1213 SE 3rd Ave., Fort Lauderdale, FL 33316

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT A

DOCUMENTS TO PRODUCE

1. Jessica Guasto's complete personnel file, **EXCLUDING** any medical information.
2. To the extent not in the personnel file, all documents (which includes but is not limited to emails and text messages) relating to any discipline of Jessica Guasto.
3. To the extent not in the personnel file, all documents (which includes but is not limited to emails and text messages) relating to Jessica Guasto's separation from employment.
4. To the extent not in the personnel file, all documents (which includes but is not limited to emails and text messages) relating to any complaints of any kind made by Jessica Guasto.
5. To the extent not in the personnel file, all documents reflecting any and all compensation received by Jessica Guasto, including but not limited to complete payroll records for Jessica Guasto.

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JESSICA GUASTO

Plaintiff

v.

CITY OF MIAMI BEACH

Defendant

Civil Action No. 1:22-CV-21004-DPG

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

City of Opa Locka

Custodian of Records: Joanna Flores 780 Fisherman Street, 4th Floor, Op-Locka 33054

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: SEE EXHIBIT A

In lieu of appearance, documents can be emailed to: Michael L. Elkins, Esq. melkins@mlelawfirm.com

Place: MLE Law 1213 SE 3rd Ave Fort Lauderdale, FL 33316	Date and Time: 03/18/2024 10:00 am
--	---

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/28/2024

CLERK OF COURT

OR

*Michael Elkins**Signature of Clerk or Deputy Clerk**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* _____
City of Miami Beach _____, who issues or requests this subpoena, are:

Michael L. Elkins, Esq.; melkins@mlelawfirm.com; 1213 SE 3rd Ave., Fort Lauderdale, FL 33316

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT A

DOCUMENTS TO PRODUCE

1. Jessica Guasto's complete personnel file, **EXCLUDING** any medical information.
2. To the extent not in the personnel file, all documents (which includes but is not limited to emails and text messages) relating to any discipline of Jessica Guasto.
3. To the extent not in the personnel file, all documents (which includes but is not limited to emails and text messages) relating to Jessica Guasto's separation from employment.
4. To the extent not in the personnel file, all documents (which includes but is not limited to emails and text messages) relating to any complaints of any kind made by Jessica Guasto.
5. To the extent not in the personnel file, all documents reflecting any and all compensation received by Jessica Guasto, including but not limited to complete payroll records for Jessica Guasto.

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JESSICA GUASTO

Plaintiff

v.

CITY OF MIAMI BEACH

Defendant

Civil Action No. 1:22-CV-DPG

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Giordano Protection Services, LLC

REGISTERED AGENT: Jeffrey S. Giordano 250 NW 23rd Street, #305, Miami, FL 33127

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: SEE EXHIBIT A

In lieu of appearance, documents can be emailed to: Michael L. Elkins, Esq.: melkins@mlclawfirm.com

Place: MLE Law
1213 SE 3rd Ave.
Fort Lauderdale, FL 33316

Date and Time:

03/18/2024 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/28/2024

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk**Michael Elkins**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* _____
City of Miami Beach _____, who issues or requests this subpoena, are:

Michael L. Elkins, Esq.; melkins@mlclawfirm.com; 1213 SE 3rd Ave. Fort Lauderdale, FL 33316

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT A

DOCUMENTS TO PRODUCE

1. Jessica Guasto's complete personnel file, **EXCLUDING** any medical information.
2. To the extent not in the personnel file, all documents (which includes but is not limited to emails and text messages) relating to any discipline of Jessica Guasto.
3. To the extent not in the personnel file, all documents (which includes but is not limited to emails and text messages) relating to Jessica Guasto's separation from employment.
4. To the extent not in the personnel file, all documents (which includes but is not limited to emails and text messages) relating to any complaints of any kind made by Jessica Guasto.
5. To the extent not in the personnel file, all documents reflecting any and all compensation received by Jessica Guasto, including but not limited to complete payroll records for Jessica Guasto.